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7 *Attorney for Plaintiff Tajzania Wilson*

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **TAJZANIA WILSON**

11 **CIVIL ACTION NO. 8:15-cv-799**

12 **Plaintiff,**

13 **v.**

14 **EXPERIAN INFORMATION**  
15 **SOLUTIONS, INC.**  
16 **and**  
**REALPAGE, INC.**

17 **COMPLAINT FOR VIOLATIONS OF**  
**FAIR CREDIT REPORTING ACT**

18 **DEMAND FOR JURY TRIAL**

19 **Defendants.**

20 **PRELIMINARY STATEMENT**

21 1. This is an action for damages brought by an individual consumer,  
22 Tajzania Wilson, against Experian Information Solutions, Inc. and Realpage, Inc.  
23 for violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §§ 1681, *et*  
*seq., as amended.*

24 **JURISDICTION AND VENUE**

25 2. Jurisdiction of this Court arises under 15 U.S.C. § 1681p, 28 U.S.C. §  
26 1331.

3. Venue lies in this district pursuant to 28 U.S.C. § 1391(b).

## PARTIES

4. Plaintiff Tajzania Wilson is an adult individual residing in Riverdale, GA.

5. Defendant Experian Information Solutions, Inc. (“Experian”) is a business entity and consumer reporting agency that regularly conducts business in the Central District of California, and which has its headquarters and a principal place of business located at 475 Anton Boulevard, Costa Mesa, CA.

6. Defendant Realpage, Inc. (“Realpage”) is a credit reporting agency and a reseller of credit information that regularly conducts business in the Central District of California and which has a Registered Agent located at 170 East Town Street, Columbus, OH 43210.

## FACTUAL ALLEGATIONS

7. Defendants have been reporting derogatory and inaccurate statements and information relating to Plaintiff and Plaintiff's credit history to third parties ("inaccurate information") from at least October 2014 through present. The inaccurate information includes highly derogatory public records and identifying personal information.

8. The inaccurate information negatively reflects upon the Plaintiff, Plaintiff's credit repayment history, Plaintiff's financial responsibility as a debtor and Plaintiff's creditworthiness. The inaccurate information consists of accounts and/or tradelines that do not belong to the Plaintiff, and that actually belong to another consumer. Due to Defendants' faulty procedures, Defendants mixed the credit file of Plaintiff and that of another consumer with respect to the inaccurate information and other personal identifying information.

1       9. Defendants have been reporting the inaccurate information through the  
2 issuance of false and inaccurate credit information and consumer credit reports that  
3 they have disseminated to various persons and credit grantors, both known and  
4 unknown. Defendants have repeatedly published and disseminated consumer  
5 reports to such third parties from at least October 2014 through the present.

6 Plaintiff's credit report and file has been obtained from Defendants and  
7 have been reviewed by prospective and existing credit grantors and extenders of  
8 credit, and the inaccurate information has been a substantial factor in precluding  
9 Plaintiff from receiving different credit offers and opportunities, known and  
10 unknown. Plaintiff's credit reports have been obtained from Defendants by such  
11 third parties from at least October 2014 through the present.

12        11. As of result of Defendants' conduct, Plaintiff has suffered actual  
13 damages in the form of lost credit opportunities, harm to credit reputation and credit  
14 score, and emotional distress including humiliation and embarrassment.

15        12. At all times pertinent hereto, Defendants were acting by and through  
16 their agents, servants and/or employees who were acting within the course and  
17 scope of their agency or employment, and under the direct supervision and control  
18 of the Defendants herein.

19       13. At all times pertinent hereto, the conduct of the Defendants, as well as  
20 that of their agents, servants and/or employees, was intentional, willful, reckless,  
21 and in grossly negligent disregard for federal laws and the rights of the Plaintiff  
22 herein.

## COUNT ONE – VIOLATIONS OF THE FCRA

## (Plaintiff v. Defendants)

25        14. Plaintiff incorporates the foregoing paragraphs as though the same  
26 were set forth at length herein.

27 15. At all times pertinent hereto, Experian was a “person” and a “consumer reporting agency” as those terms are defined by 15 U.S.C. § 1681a(b) and (f).

16. At all times pertinent hereto, Realpage was a “person,” a “consumer reporting agency,” and a “reseller” as those terms are defined by 15 U.S.C. § 1681a(b), § 1681a(f) and § 1681a(u), respectively.

17. At all times pertinent hereto, Plaintiff was a “consumer” as that term is defined by 15 U.S.C. § 1681a(c).

18. At all times pertinent hereto, the above-mentioned credit reports were “consumer reports” as that term is defined by 15 U.S.C. § 1681a(d).

19. Pursuant to 15 U.S.C. § 1681n and 15 U.S.C. § 1681o, Defendants are each liable to the Plaintiff for willfully and negligently failing to comply with the requirements imposed on a consumer reporting agency of information pursuant to 15 U.S.C. § 1681e(b).

20. The conduct of Defendants was a direct and proximate cause, as well as a substantial factor, in bringing about the serious injuries, actual damages and harm to the Plaintiff that are outlined more fully above and, as a result, Defendants are liable to the Plaintiff for the full amount of statutory, actual and punitive damages, along with the attorney's fees and the costs of litigation, as well as such further relief, as may be permitted by law.

## **JURY TRIAL DEMAND**

21. Plaintiff demand trial by jury on all issues so triable.

## **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully prays that relief be granted as follows:

- (a) Actual damages;
- (b) Statutory damages;
- (c) Punitive damages;

1 (d) Costs and reasonable attorney's fees; and  
2 (e) Such other and further relief as may be just and proper.

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5 Date: May 22, 2015

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